

1           **SCHIAN WALKER, P.L.C.**

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7           SCOTT R. GOLDBERG, #015082

8           CODY J. JESS, #025066

9           Proposed Attorneys for Debtors

10           **UNITED STATES BANKRUPTCY COURT**

11           **DISTRICT OF ARIZONA**

12           In re:

13           THORNWOOD FURNITURE  
14           MANUFACTURING, INCORPORATED,

15           Debtor.

16           No. 2-10-bk-17750-RJH

17           CHAPTER 11

18           **MOTION FOR JOINT ADMINISTRATION**

19           Thornwood Furniture Manufacturing, Incorporated ("Thornwood"), and Albacore  
20           Holdings, LLC ("Albacore" and with Thornwood, "the "Debtors"), pursuant to Rule 1015(b)(4),  
21           Federal Rules of Bankruptcy Procedure, request that this bankruptcy case be jointly administered with  
22           the bankruptcy case of *In re Albacore Holdings, LLC*, No. 2-10-bk-17754-SSC. In support of this  
23           Motion for Joint Administration ("Motion"), the Debtors represent the following:

24           1. On June 7, 2010, the Debtors filed voluntary petitions under Chapter 11 of the  
25           Bankruptcy Code. The Albacore case is proceeding before the Honorable Sarah S. Curley, while the  
26           Thornwood bankruptcy case is before this Court.

27           2. Thornwood is in the business of manufacturing retail and commercial furniture,  
28           while Albacore owns the real property upon which Thornwood operates. The Debtors share common  
29           ownership, corporate officers and share the same single secured creditor, M&I Marshall & Ilsley Bank  
30           ("M&I"). M&I alleges that the loans it made to the Debtors are cross-defaulted and cross-collateralized.  
31           The reorganization of one debtor is dependent upon the reorganization of the other debtor, and both  
32           Debtors intend to restructure their obligations to M&I under a joint plan of reorganization.

1           3. The cost to creditors, if the cases are jointly administered, will be substantially  
2 decreased by avoiding duplicate notices and mailings to creditors and duplicate pleadings in all cases.

3           4. The Debtors have noticed this Motion to the Office of the United States Trustee,  
4 creditors, and other interested parties as listed on the Debtors' master mailing lists. The Debtors propose  
5 to give notice of the entry of an order approving this Motion in the form attached hereto as Exhibit "A."

6           WHEREFORE, the Debtors respectfully request that the Court order the joint  
7 administration of Thornwood Furniture Manufacturing, Incorporated, and Albacore Holdings, LLC  
8 under the case Thornwood Furniture Manufacturing, Incorporated, No. 2:10-bk-17750-RJH, under the  
9 following caption:

10 In re:

11 THORNWOOD FURNITURE  
MANUFACTURING, INCORPORATED,

12           Debtor.

No. 2:10-bk-17750-RJH

No. 2:10-bk-17754

(Jointly Administered)

13 CHAPTER 11

14 In re:

15 ALBACORE HOLDINGS, LLC,

16           Debtor.

17  
18           DATED this 8th day of June, 2010.

19           SCHIAN WALKER, P.L.C.

20           By /s/ CODY J. JESS, #025066

21           Scott R. Goldberg

22           Cody J. Jess

23           Proposed Attorneys for Debtors

1 COPY of the foregoing  
2 e-mailed this 8th day  
of June, 2010, to:

3 Edward K. Bernatavicius, Esq.  
4 U.S. Trustee's Office  
230 North First Avenue, #204  
Phoenix, Arizona 85003-1706  
5 [edward.k.bernatavicius@usdoj.gov](mailto:edward.k.bernatavicius@usdoj.gov)

6 Brian Sirower, Esq.  
7 Michael Migliaccio, Esq.  
Quarles & Brady, LLP  
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8 Phoenix, Arizona 85004-2391  
Attorneys for M&I Marshall & Ilsley Bank  
9 [bsirower@quarles.com](mailto:bsirower@quarles.com)  
[michael.migliaccio@quarles.com](mailto:michael.migliaccio@quarles.com)

10 and COPY mailed to:

11 Debtors' List of 20 Largest  
12 Unsecured Creditors

13 /s/ DEBBI STEPHENS

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# **EXHIBIT "A"**

1           **SCHIAN WALKER, P.L.C.**

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10           **UNITED STATES BANKRUPTCY COURT**

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12           In re:

13           THORNWOOD FURNITURE  
14           MANUFACTURING, INCORPORATED,

15           Debtor.

16           No. 2-10-bk-17750-RJH

17           No. 2-10-bk-17754

18           (Jointly Administered)

19           CHAPTER 11

20           In re:

21           ALBACORE HOLDINGS, LLC,

22           Debtor.

23           **ORDER APPROVING MOTION FOR  
24           JOINT ADMINISTRATION**

25           Thornwood Furniture Manufacturing, Incorporated and Albacore Holdings, LLC, debtors  
26           and debtors-in-possession in the above-referenced Chapter 11 proceedings (the "Debtors"), having filed  
their *Motion for Joint Administration* (the "Motion"), and good cause appearing,

27           IT IS HEREBY ORDERED that the Motion is approved and the cases will be jointly  
28           administered under the first-filed case: Thornwood Furniture Manufacturing, Incorporated, Case No.  
29           2:10-bk-17750-RJH.

30           IT IS FURTHER ORDERED that the Debtors shall provide notice of the Motion to all  
31           creditors and parties-in-interest, with opportunity to object, pursuant to Rule 2002, Federal Rules of  
32           Bankruptcy Procedure.

33           IT IS ORDERED directing the Clerk of the Court to jointly administer the above-  
34           captioned bankruptcy cases so that all pleadings and documents filed in these cases, including in any

1 adversary proceeding, or contested matter, be filed under Case No. 2:10-bk-17750-RJH, using the above  
2 caption.

3 IT IS FURTHER ORDERED directing proposed counsel for the Debtors to file a  
4 consolidated master mailing list containing the names and addresses of the creditors in each bankruptcy  
5 case.

6 IT IS FURTHER ORDERED that unless an objection to the entry of this Order is timely  
7 made, this Order approving joint administration shall become final.

8 DATED AND SIGNED ABOVE.

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